UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: RAYMOND O. ARMSTRONG : CHAPTER 13

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

:

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RAYMOND O. ARMSTRONG

VS.

Respondent(s) : CASE NO. 1-16-bk-00409

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 30th day of August, 2016, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:
 - a. Clarification of debtor(s) counsel fees which are in conflict with 2016(b) Statement.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/James K. Jones

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 30th day of August, 2016, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Keith DeArmond, Esquire 18 South George Street, Ste. 610 York, PA 17401

<u>/s/Deborah A. Behney</u>
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee